



settlement of potential penalties totaling more than \$350 million (Dkt. 1) and therefore, requires high level approval within the Department of Justice, beyond the United States Attorney's Office and U.S. Customs and Border Protection. Defendants, although ever optimistic, have consistently communicated that the internal approval process is both lengthy and bureaucratic.

Defendants are pleased to update the Court that the settlement has now been reviewed by the International Trade Field Office and the Director of the National Courts Section. However, the settlement still requires three additional levels of progressively higher review within senior Department of Justice leadership, including final approval by the Associate Attorney General or her delegate. 28 CFR §§ 0.160-161. Undersigned counsel has been advised that the current estimate is no earlier than mid-January, in order for each level to have sufficient substantive review.

Defendants request that the Court continue a stay of all deadlines in this case for 30 days, until January 4, 2024. At which time Defendants shall provide an updated report on the status of approval.

RESPECTFULLY SUBMITTED this 5<sup>th</sup> day of December 2023, in Anchorage, Alaska.

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s/ Dustin M. Glazier  
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**CERTIFICATE OF SERVICE**

I hereby certify that on December 5, 2023,  
a copy of the foregoing was served electronically on:

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